

1 PHILLIP A. TALBERT  
United States Attorney  
2 MATHEW W. PILE  
Associate General Counsel  
3 Office of Program Litigation, Office 7  
Oscar Gonzalez de Llano  
4 Special Assistant United States Attorney  
Social Security Administration  
5 Office of General Counsel  
6401 Security Boulevard  
6 Baltimore, MD 21235  
Telephone: (510) 970-4818  
7 Email: Oscar.Gonzalez@ssa.gov  
Attorneys for Defendant  
8  
9  
10  
11

12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF CALIFORNIA

14 JENNY ANN BURKS, o/b/o BAMAB  
15 (Minor),

16 Plaintiff,

17 v.

18 Commissioner of Social Security,

19 Defendant.

No. 2:24-cv-02477-DMC

STIPULATED MOTION AND ORDER FOR  
AN EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT

20  
21 IT IS HEREBY STIPULATED, by and between the parties through their respective  
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's  
23 Motion for Summary Judgment be extended thirty-three (33) days from January 8, 2025, to  
24 February 10, 2025. This is Defendant's first request for an extension. Counsel for Plaintiff has  
25 no objection to Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time  
27 because Counsel for Defendant has and will be unable to devote the time required to complete its  
28

1 response. Counsel has multiple merit briefs currently due in district court cases within the next  
2 week. Counsel for Defendant was also out of the office for much of the previous couple weeks  
3 including December 23rd – 26th and December 30th – January 1<sup>st</sup> due to planned holiday as well  
4 as illness. Given upcoming competing workload requirements an extension until February 10,  
5 2025, will provide the opportunity for the undersigned Counsel for Defendant to prioritize  
6 completing the response to Plaintiff’s Motion for Summary Judgment. The undersigned Counsel  
7 apologizes to the Court and Plaintiff’s counsel for any inconvenience caused by this request and  
8 delay. All other dates in the Court’s Scheduling Order shall be extended accordingly.

9  
10 Respectfully submitted,

11 PHILLIP A. TALBERT  
12 United States Attorney

13 DATE: January 7, 2025

14 By: s/ Oscar Gonzalez de Llano  
15 OSCAR GONZALEZ DE LLANO  
16 Special Assistant United States Attorney  
17 Attorneys for Defendant

18  
19 Respectfully submitted,

20 DATE: January 7, 2025

21 By: s/ Sherianne Laba \*  
22 SHERIANNE LABA, ESQ.  
23 Osterhout Berger Daly  
24 (\*as authorized by email)  
25 Attorney for Plaintiff  
26  
27  
28

ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including February 10, 2025, to respond to Plaintiff's Motion for Summary Judgment.

Dated: January 8, 2025

A handwritten signature in dark ink, appearing to read 'Dennis M. Cota', written over a horizontal line.

DENNIS M. COTA  
UNITED STATES MAGISTRATE JUDGE